

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP
Attorneys for Central Falls Detention Facility
Corporation and Dr. Edward Blanchette, M.D.
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Attn: Lalit K. Loomba, Esq.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHAWN S. LEHAL,	: Docket No. 13-CV-3923 (DCF)
	:
Plaintiff,	:
	:
-against-	: NOTICE OF MOTION FOR
	: SUMMARY JUDGMENT
	:
CENTRAL FALLS DETENTION FACILITY	:
CORPORATION, EDWARD BLANCHETTE, M.D.,	:
JAMES MASTERSON, ROBERT MARTIN and ERIC	:
KING,	:
	:
Defendants.	:
-----	X

TO:

WILMER CUTLER PICKERING HALE and DOOR LLP
Attorneys for Plaintiff
7 World Trade Center
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(212) 230-8800
Attn: Fiona Kaye, Esq.

PLEASE TAKE NOTICE that upon (i) the annexed statement of undisputed material facts pursuant to Local Rule 56.1 dated March 30, 2018; (ii) the annexed declaration of Lalit K. Loomba, Esq., dated March 30, 2018 (and the exhibits thereto); (iii) the annexed declaration of Bonnie White, dated March 29, 2018; (iv) the accompanying memorandum of law dated April 6, 2018; and (v) all the prior proceedings herein, defendants Central Falls Detention Facility

Corporation ("CFDFC") and Dr. Edward Blanchette, M.D., will move this Court, before the Hon. Debra C. Freeman, on June 15, 2018, or as soon thereafter as counsel may be heard, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment in favor of CFDFC and Dr. Blanchette, and for such other, further and different relief as the Court in its discretion may deem just and proper.

PLEASE TAKE FURTHER NOTICE that per the briefing scheduled adopted by the Court (D.E. 171), opposition to this motion must be filed and served on or before May 18, 2018; and replies must be filed and served on or before June 15, 2018.

Dated: White Plains, New York
April 6, 2018

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP
Attorneys for Central Falls Detention
Facility Corporation and Dr. Edward
Blanchette, M.D.



Lalit K. Loomba, Esq.

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Our File No. 10899.00252